

FUNDING COMMITMENT REPORT  
Billed Entity Name: GLYNN COUNTY SCHOOL DISTRICT  
BEN: 127476  
Funding Year: 2007

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 576358  
Funding Request Number: ~~01523339~~  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 504960000616309  
SPIN: 143014328  
Service Provider Name: Safari Video Networks, a division Of Library Video  
Contract Number: N/A  
Billing Account Number: N/A  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2007  
Service End Date: N/A  
Contract Award Date: 02/05/2007  
Contract Expiration Date: 09/30/2008  
Site Identifier: 34313  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$51,850.00  
Pre-discount Amount: \$51,850.00  
Discount Percentage Approved by the USAC: ~~80%~~  
Funding Commitment Decision: ~~\$0.00~~ -- Srvc/Discnt will NOT be funded  
Funding Commitment Decision Explanation: MR1: GLYNN CO FACILITIES, GLYNN CO  
TRANSPORTATION, GLYNN CO ATHLETIC DEPT and GLYNN CO FOOD AND NUTRITION has been  
removed from Block 4 of the Form 471 application at the request of the applicant.  
<><><><><> MR2: The shared discount was reduced to a level that could be validated  
by third party data. <><><><><> DR1: Given Program demand, the funding cap will not  
provide for Internal Connections and/or Basic Maintenance of Internal Connections at  
your approved discount level to be funded. Please see  
<http://www.universalservice.org/sl/> for further details.

ECDL Date: 04/15/2008

Wave Number: 046

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2009

# GLYNN - NSLP STATS

----- Original Message -----

**From:** Robert Beck

**To:** Cooper, Sal

**Sent:** Tuesday, August 21, 2007 1:36 PM

**Subject:** E-rate applications 554338 and 576358 - Glynn County

Sal -

I just faxed you additional information on this request - namely the NSLP information (Item 3). Note that, of the 13 schools you cite, 6 have the 90% discount rate verified by the survey method, and the other 7 not (not enough surveys returned). So, for those 7 schools, we will use the data that the Food Service Director sent to the state of Georgia last October.

Let me know if you have further questions on this.

Bob Beck

Education Consortium

267-352-0137

215-504-5047 (fax)

TRANSMISSION VERIFICATION REPORT

TIME : 08/21/2007 12:24  
NAME : EDUCATION CONSORTIUM  
FAX : 2155045047  
TEL : 2155045047  
SER.# : BR0L6J569870

DATE, TIME	08/21 12:23
FAX NO./NAME	19735996513
DURATION	00:01:25
PAGE(S)	05
RESULT	OK
MODE	STANDARD
	ECM



Educational Consortium for  
Telecommunications Savings

To: Sal Cooper

From: Bob Beck

SD: SLD - PIA Review

Company: Education Consortium

Voice: 973-581-5373

Voice: 267-352-0137

Fax: 973-599-6513

Fax: 215-504-5047

Date: 8/21/07

Pages 5 Pages including this sheet

471 Application # 554338  
Glynn County (GA)  
NSLP Statistics - 13 schools  
See grid, attached...

The District used the alternate discount method for (6) of the schools listed on the grid (attached) for which there was a 50% or greater return. Using that data, I've provided the 'Adjusted P/R' info and percentage to justify a 90% discount rate (last 3 columns).

**Projections based on surveys**

If a school has sent a survey to the households of all of its students, and if it receives a return rate of at least 50 percent of those questionnaires, it may use that data to project the percentage of eligibility for NSLP D for all students in the school. For example, a school with 100 students sent a survey to the 100



Educational Consortium for  
Telecommunications Savings

**To: Sal Cooper**

**From: Bob Beck**

**SD: SLD – PIA Review**

**Company: Education Consortium**

**Voice: 973-581-5373**

**Voice: 267-352-0137**

**Fax: 973-599-6513**

**Fax: 215-504-5047**

**Date: 8/21/07**

**Pages 5 Pages including this sheet**

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471 Application # 554338  
Glynn County (GA)  
NSLP Statistics – 13 schools  
See grid, attached...

The District used the alternate discount method for (6) of the schools listed on the grid (attached) for which there was a 50% or greater return. Using that data, I've provided the 'Adjusted F/R' info and percentage to justify a 90% discount rate (last 3 columns).

**Projections based on surveys**

If a school has sent a survey to the households of all of its students, and if it receives a return rate of at least 50 percent of those questionnaires, it may use that data to project the percentage of eligibility for NSLP for all students in the school. For example, a school with 100 students sent a survey to the 100 households of those students, and 75 of those households returned the questionnaire. The school finds that the incomes of 25 of those 75 households are at or below the IEGs for NSLP. Consequently, 33 percent ( $25 / 75 * 100$ ) of the students from those households can be counted as eligible for NSLP. The school may then project from that sample to conclude that 33 percent of the total enrollment, or 33 of the 100 students in the school, can be counted as eligible for NSLP.

For the other (7) schools, they were unable to document a 50% or greater survey return, and so I have included the NSLP information Marie Richardson reported to the state on her October 31, 2006 form. You may already have that on your GA state grid info, or I can fax you a copy of the form I have in hand.

I've attached a filled-out copy of the survey that covers the requirements listed on the USAC web site. In this particular survey that Marie sent, the household detail that

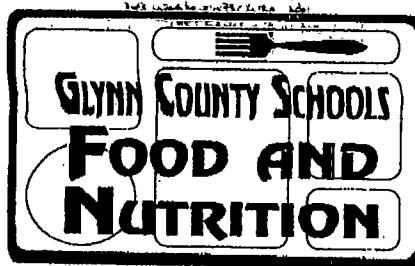
would normally be provided was left out because the family has a Food Stamp or TANF case number and are instructed to skip that section.

Thanks, and let me know what additional questions you have about these items.

[robertbeck@e-rate-ects.org](mailto:robertbeck@e-rate-ects.org)

Robert Beck

								Adjusted		
Num	School	Total Pop'n	Number of Surveys Sent	Returned	Pct Returned	50%?	Total F/R	Num F/R	Pct F/R*	Discount Rate
1	Glyndale ES	715	715	383	53.6%	YES	370	691	96.61%	90%
2	Golden Isles ES	958	958	494	51.6%	YES	477	925	96.56%	90%
3	Needwood MS	877	877	449	51.2%	YES	427	834	95.10%	90%
4	<del>Altama ES</del>	710	710	542	76.3%	YES	523	685	96.49%	90%
5	Jane Macon MS	774	774	430	55.6%	YES	413	743	96.05%	90%
6	Risley MS	493	493	318	64.5%	YES	310	481	97.48%	90%
7	Oglethorpe Point ES	585	350	118	20.2%	NO		108	18.46%	50%
8	Satilla Marsh ES	710	710	200	28.2%	NO		181	25.49%	60%
9	Greer ES	770	770	333	43.2%	NO		335	43.51%	70%
10	St Simons ES	446	400	127	28.5%	NO		118	26.46%	60%
11	Brunswick HS	1734	1500	675	38.9%	NO		726	41.87%	70%
12	Glynn Academy	1677	1500	544	32.4%	NO		551	32.86%	60%
13	Glynn MS	690	690	296	42.9%	NO		342	49.57%	80%



*Equal Opportunity Employer*

804 Monck Street • Brunswick, GA 31520  
(912) 261-4434 • FAX (912) 261-4438

August 17, 2007

To Whomever:

Per your request, we used the survey method to determine the free/reduced lunch eligibility for (6) schools in the Glynn County SD for the 2007-2008 school year, as listed in the spreadsheet (attached). Note that these surveys were given to each incoming student / family as a part of the formal enrollment process.

These surveys will be kept on file for inspection for five (5) years.

"I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, Block 4 of the Form 471."

Sincerely,

A handwritten signature in cursive script, appearing to read 'Marie Richardson', written in dark ink.

Marie Richardson, PhD, RD  
Director of Food & Nutrition  
Glynn County Schools

Marie Richardson, R.D.  
Director

Janet Mitchell  
Coordinator

Shirley Lee  
Bookkeeper

Sarah Wainright  
Secretary

Theresa Sauseda  
Free and Reduced  
Lunch Applications

One Application per Household Effective July 1, 2005

**FREE AND REDUCED PRICE SCHOOL MEALS FAMILY APPLICATION****Part 1. Children in School (Use a separate application for each foster child)**

Names of all children in school (First, Middle Initial, Last)	School	Grade	School ID#	Birthday	Food Stamp or TANF case # (if any). Skip to Part 5 if you list a Food Stamp or TANF case #
Wendell Bussey	64	1	38415	11-13-99	942581218

**Part 2. If the child you are applying for is homeless, migrant, or a runaway check the appropriate box**Homeless ☐ Migrant ☐ Runaway ☐**Part 3. Foster Child**If this application is for a child who is the legal responsibility of a welfare agency or court, check this box ☐ and then list the amount of the child's personal use monthly income: \$ \_\_\_\_\_. Skip to Part 5.**Part 4. Total Household Gross Income—You must tell us how much and how often**

1. Name (List everyone in household) (Example) Jane Smith	2. Gross income and how often it was received Example: \$100/monthly \$100/twice a month \$100/every other week \$100/weekly				3. Check if NO Income
	Earnings from work before deductions	Welfare, child support, alimony	Pensions, retirement, Social Security	All Other Income	
Jane Smith	\$200/weekly	\$150/weekly	\$100/monthly	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>

**Part 5. Signature and Social Security Number (Adult must sign)**

An adult household member must sign the application. If Part 4 is completed, the adult signing the form must also list his or her Social Security Number or mark the "I do not have a Social Security Number" box. (See Privacy Act Statement on the back of this page.)

I certify (promise) that all information on this application is true and that all income is reported. I understand that the school will get Federal funds based on the information I give. I understand that school officials may verify (check) the information. I understand that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted.

Sign here: X [Signature] Print name: Tiffany HallAddress: 2628 Johnson Street Phone Number: (912) 580-1059Social Security Number: 267-65-9582 ☐ I do not have a Social Security Number**Part 6. Children's racial and ethnic identities (optional)**

Mark one or more racial identities:

- ☐ Asian ☐ American Indian or Alaska Native  
☐ White ☐ Native Hawaiian or Other Pacific Islander  
☐ Black or African American ☐ Other

Mark one ethnic identity:

- ☐ Hispanic or Latino  
☐ Not Hispanic or Latino

**Don't fill out this part. This is for school use only.**

Annual Income Conversion: Weekly x 52, Every 2 Weeks x 26, Twice A Month x 24 Monthly x 12

Total Income: \_\_\_\_\_ Per: ☐ Week, ☐ Every 2 Weeks, ☐ Twice A Month, ☐ Month, ☐ Year Household size: \_\_\_\_\_

Categorical Eligibility: \_\_\_\_\_ Date Withdrawn: \_\_\_\_\_ Eligibility: Free \_\_\_\_\_ Reduced \_\_\_\_\_ Denied \_\_\_\_\_ Reason: \_\_\_\_\_

Temporary: Free \_\_\_\_\_ Reduced \_\_\_\_\_ Time Period: \_\_\_\_\_ (expires after \_\_\_\_\_ days)

Determining Official's Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
Confirming Official's Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Follow-up Official's Signature: \_\_\_\_\_ Date: \_\_\_\_\_



**Robert Beck**

**From:** "Robert Beck" <RobertBeck@e-rate-ects.org>  
**To:** "Cooper, Sal" <SCOOPER@sl.universalservice.org>  
**Sent:** Monday, November 19, 2007 3:05 PM  
**Subject:** Glynn County

Sal -

See response below - we're responding 'No' for two reasons:

1. I've been successfully using this particular policy (using NSLP application forms as surveys) for several years now, and the USAC policy was changed after-the-fact of June in this year, four (4) months after the application was filed in February. So we feel it should be reviewed using the policy in effect when the application was submitted.
2. For this current funding year (2007-2008), I have already had three (3) applications approved, and FCDL's issued, using this particular survey method as the basis for calculating the district's discount percentage. So to deny it would constitute unequal treatment of this application.

Thanks.

Bob Beck

----- Original Message -----

**From:** Cooper, Sal  
**To:** Robert Beck  
**Sent:** Friday, November 09, 2007 9:40 AM  
**Subject:** RE: Glynn County

I have attached the USAC website reference where it states under the Surveys paragraph that "Applicants cannot use National School Lunch Application forms as surveys":

1. Based on the documentation that you have provided, we intend to modify application 576358 FRN 1593430 from 90% to 80%, FRN 1593839 from 90% to 80% and FRN 1594075 from 77% to 72% via the following entities were modified because applications used for discount cannot be extrapolated:

- a) JANE MACON MIDDLE SCHOOL from 90% to 80%
- b) RISLEY MIDDLE SCHOOL from 90% to 80%
- c) GLYNDALE ELEMENTARY SCHOOL from 90% to 80%
- d) ~~ALTA MA ELEMENTARY SCHOOL from 90% to 80%~~
- e) GOLDEN ISLES ELEMENTARY SCHOOL from 90% to 80%
- f) NEEDWOOD MIDDLE SCHOOL from 90% to 70%

**We are providing you with an opportunity to confirm that your original response(s) is correct. Please confirm that this change(s) listed above should be undertaken. \_\_\_\_\_**

**Yes or ☒ No**

If the FRN should not be modified and you have alternative information, please provide the supporting documentation.

If you fail to respond to this email within 15 days, we will perform the action(s) listed above.

5/8/2008

Sal Cooper  
 Schools & Library Division  
 Phone: 973-581-5373  
 Fax: 973-599-6513  
 Email: [scooper@sl.universalservice.org](mailto:scooper@sl.universalservice.org)

**From:** Robert Beck [<mailto:RobertBeck@e-rate-ects.org>]  
**Sent:** Thursday, November 08, 2007 4:20 PM  
**To:** Cooper, Sal  
**Subject:** Glynn County

Sal -

This email is long now, I just copied out your latest portion. See my responses in red, below.  
 Bob Beck

Education Consortium  
 267-352-0137  
 215-504-5047 (fax)

1. Based on the documentation that you have provided, we intend to modify application 576358 FRN 1593430 from 90% to 80%, FRN 1593839 from 90% to 80% and FRN 1594075 from 77% to 72% via the following entities were modified because applications used for discount cannot be extrapolated:

- a) JANE MACON MIDDLE SCHOOL from 90% to 80%
- b) RISLEY MIDDLE SCHOOL from 90% to 80%
- c) GLYNDAL ELEMNTARY SCHOOL from 90% to 80%
- d) ALTAMA ELEMNTARY SCHOOL from 90% to 80%
- e) GOLDEN ISLES ELEMNTARY SCHOOL from 90% to 80%
- f) NEEDWOOD MIDDLE SCHOOL from 90% to 70%

We are providing you with an opportunity to confirm that your original response(s) is correct. Please confirm that this change(s) listed above should be undertaken. ☐ Yes or ☐ No.

If the FRN should not be modified and you have alternative information, please provide the supporting documentation.

If you fail to respond to this email within 15 days, we will perform the action(s) listed above.

I don't understand the statement: "the following entities were modified because applications used for discount cannot be extrapolated:." Since we had supplied proof of these discount levels, what does that statement mean, and where is it on the USAC web site?

2. Based on the documentation that you have provided, we intend to modify application 576358 FRN 1593393 from \$62,386.91 to \$52,940.91 to remove the following Maintenance Charges(Tandberg Gatekeeper 12 month Customer Care - \$1,450; Tandberg MCU 12 month Custom Care - \$4,599, Additional 79% of Tandberg MediaPlace - \$1,027 and Additional 79% of Post Installation Technical Support 30 Hours - \$2,370) via the form 470 did not post for Basic Maintenance.

We are providing you with an opportunity to confirm that your original response(s) is correct. Please confirm that this change(s) listed above should be undertaken. ☐ Yes or ☒ No.

If the FRN should not be modified and you have alternative information, please provide the supporting documentation.

If you fail to respond to this email within 15 days, we will perform the action(s) listed above.

5/8/2008

3. Based on the documentation that you have provided, we intend to modify application 576358 FRNs 1593430 and 1593479 from \$19,692.91 to \$16,295.91 to remove the following *Maintenance Charges*(Additional 79% of Tandberg MediaPlace - \$1,027 and Additional 79% of Post Installation Technical Support 30 Hours - \$2,370) via the form 470 did not post for Basic Maintenance.

We are providing you with an opportunity to confirm that your original response(s) is correct.

Please confirm that this change(s) listed above should be undertaken. ☐ Yes or ☒ No.

If the FRN should not be modified and you have alternative information, please provide the supporting documentation.

If you fail to respond to this email within 15 days, we will perform the action(s) listed above.

Both of these sets of charges are being denied for the same reason - we hadn't applied for Basic Maintenance of I.C. However, we did apply for maintenance as a component of the

**Internal Connection** request. If you refer to the ESL for October 2006, in the section on Miscellaneous Fees & Charges on page 20, it states that "Extended warranties and service contracts are eligible only for that portion associated with the relevant funding year." We have routinely applied and been funded for the maintenance associated with new hardware purchases for the initial installation year. And in the header for the Miscellaneous section, it states that the charges should reflect the products or services being requested, which is Internal Connections in this case.

Sal Cooper

Schools & Library Division

Phone: 973-581-5373

Fax: 973-599-6513

Email: [scooper@sl.universalservice.org](mailto:scooper@sl.universalservice.org)

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**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2007-2008**

July 14, 2008

Robert Beck  
Education Consortium  
790 Newtown-Yardley Road  
Suite 410  
Newtown, PA 18940

Re: Applicant Name: GLYNN COUNTY SCHOOL DISTRICT  
Billed Entity Number: 127476  
Form 471 Application Number: 576358  
Funding Request Number(s): 1593393, 1593430, 1593479, 1593839  
Your Correspondence Dated: May 14, 2008

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2007 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): ~~1593393, 1593430, 1593479, 1593839~~  
Decision on Appeal: **Denied**  
Explanation:

- During the Appeal Review USAC thoroughly assessed the facts presented in the appeal letter, the relevant documentation on file, and the FCC Rules and Procedures before making its determination on your appeal. Under FRNs 1593430 and 1593839, USAC has determined that the correct discount for Altama Elementary School (BEN 34313) is 80% based on the documentation submitted during the initial review of this Form 471 application. On appeal, Glynn County School District is contesting USAC's decision to modify the site specific discount from 90% to 80% for Altama Elementary School. In support of the appeal, the District is asserting that when they filed the Form 471, the district followed the instructions that were posted on USAC website, which did not prohibit the usage of the National School Lunch Program (NSLP) forms as surveys. The record

shows that the district used NSLP application forms as surveys and used the extrapolation methodology to calculate the aforementioned entity discount level.

Program procedures dictate that schools who participate in the NSLP can not use NSLP application forms as survey instruments to extrapolate a discount. National School Lunch Application forms can be used as evidence of financial need, as long as they are based on, or do not exceed, the same measure of poverty used by NSLP and as long as the data is not being extrapolated. The district has not provided any documentation or evidence that USAC erred in their original decision. Consequently, the appeal is denied.

During the Appeal Review USAC thoroughly assessed the facts presented in the appeal letter, the relevant documentation on file, and the FCC Rules and Procedures before making its determination on your appeal. USAC has determined that Funding Request Numbers (FRNs) 1593393, 1593430 and 1593479 included services for Basic Maintenance of Internal Connections. The Form 470 application #504960000616309 that was referenced on these funding requests did not post for this service category. Since you were unable to provide a Form 470 that did post for Basic Maintenance of Internal Connections, the dollars for this service were removed from the request. On appeal, you have failed to provide evidence that USAC erred in its initial decision; consequently, the appeal is denied.

- FCC rules provide that the discount available to an applicant is determined by indicators of poverty and high cost. See 47 C.F.R. sec. 54.505(b). The level of poverty is measured by the percentage of students enrolled in a school or school district who are eligible for a free or reduced price lunch under the National School Lunch Program (NSLP), or a federally-approved alternative mechanism. Alternatively, the level of poverty is measured according to participation in Medicaid, Food Stamps, Supplementary Security Income (SSI), Federal Public Housing Assistance or Section 8, or Low Income Home Energy Assistance Program (LIHEAP). See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9045, FCC 97-157 para. 510 n. 1334 (rel. May 8, 1997). The high cost determination is made pursuant to FCC rules that classify a school or library as rural or urban. See 47 C.F.R. sec. 54.505(b)(3). An applicant's discount rate is determined by reference to a matrix based upon the level of poverty and whether the entity is classified as rural or urban. See 47 C.F.R. sec. 54.505(c).
- FCC rules require that all products and services for which an applicant requests discounts on an FCC Form 471 must be competitively bid on an FCC Form 470. The FCC Form 470 must include a complete description of the services for which discounts are sought, be posted on the website for 28 days, and applicants must carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting an FCC Form 471. See 47 C.F.R. secs. 54.504(a) (c), 54.511(a) and (c). These competitive bidding requirements help to ensure that applicants receive the lowest pre-discount price from vendors. See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order on Reconsideration, 12 FCC Rcd. 10095, 10098, FCC 97-246

para. 9 (rel. Jul. 10, 1997). The only exceptions to the posting requirement are for: (1) contracts signed on or before July 10, 1997 for the life of the contract; and (2) *contracts signed between July 10, 1997 and before January 30, 1998* (the date on which the website became operational) for products and/or services provided through June 30, 1999. See 47 C.F.R. sec. 54.511(c) and (d).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Al Davis

Robert Beck  
Education Consortium  
790 Newtown-Yardley Road  
Suite 410  
Newtown, PA 18940

Billed Entity Number: 127476  
Form 471 Application Number: 576358  
Form 486 Application Number:



Educational Consortium for  
Telecommunications Savings

May 14, 2008

## Appeal of FCDL Award – FY 2007-2008

### Sent to

Letter of Appeal  
Schools & Libraries Division – Correspondence Unit  
100 South Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981

### Contact Information

Robert Beck  
Education Consortium  
790 Newtown-Yardley Road, Suite 410  
Newtown, PA 18940  
267-352-0137 (voice)  
215-504-5047 (fax)  
[robertbeck@e-rate-ects.org](mailto:robertbeck@e-rate-ects.org)

### Basis for Appeal

Funding amount award for Glynn County GA School District  
1313 Egmont Street  
Brunswick, GA 31520  
BEN 127476

Funding Year 2007-2008  
471 Application Number 576358  
FRN's ~~1593393~~, ~~1593430~~, ~~1593479~~

~~Appealing a low funding award~~

### Request

This is a timely appeal regarding the reduced funding award for the Internal Connection FRN's listed above. We are requesting that the funding awards that were reduced be restored and granted full funding.

I am authorized by the school district to submit this appeal, and am the contact person on the original application.



## Explanation

Situation: the SLD reviewer disallowed \$16,240.00 in maintenance expenses, plus post installation technical expenses, that were included with the installation of the new equipment associated with these three FRN's.

Reason cited: "These FRN's contained products / services for internal connections and basic maintenance. You did not post on your Form 470 for basic maintenance." The PIA reviewer then split out the maintenance costs into separate Basic Maintenance of Internal Connection FRN's that will be disallowed because we had not filed under that category. (See FRN's 1640431, 1640435, 1640434)

We had included maintenance on the Form 470 as one of the Internal Connection installation components. In previous applications, the following policy has been followed in reviews:

- The first year's maintenance has been eligible for discounting if requested and included in the **Internal Connections** category on the Form 470.
- We would file for funding under the **Basic Maintenance of Internal Connections** separately under the following conditions:
  - If the service provider offered a *multi-year* maintenance contract, only the first year was covered under Internal Connections; we would apply for basic maintenance separately in subsequent years, or...
  - If this was a separate maintenance contract for existing equipment

In the Miscellaneous section of the Eligible Services List for FY 2007, it indicates the following under Miscellaneous Fees & Charges (Pages 19-20):

Extended warranties and service contracts are eligible only for that portion associated with the relevant funding year.

This Miscellaneous note is *not* specific to the Basic Maintenance of Internal Connections category of services, and this service contract is associated with the relevant (i.e., initial installation) funding year. By disallowing these expenses, this is a policy interpretation change constitutes unfair treatment of this application. We request that this service contract funding denial be reversed and that the three FRN's would be funded for the full amount as requested:

- FRN 1593393 - \$9,446.00
- FRN 1593430 - \$3,397.00 (there is a separate appeal for zero-funding)
- FRN 1593479 - \$3,397.00

## Conclusion

Denial of these expenses is costing the district \$16,240 in e-rate funding. We are requesting that this increase be approved for full funding we requested be approved for these FRN's.

Thank you for your consideration.

*Robert Beck*

Robert Beck  
Education Consortium  
E-Rate Contact for Glynn County SD  
Certified Mail – Return Receipt # 7007 1490 0005 0118 0988

**Authorized person information**

Andrea Preston – Chief Financial Officer (912-267-4100)

**Attachments:**

- FCDL dated April 15, 2008 – pages 1,3,4,5 of 15
- Form 470 dated January 5, 2007 requesting maintenance as part of Internal Connections application
- Item 21's - CSI LAN hardware quotes with expense breakdown for these FRN's
- Appendix A – Maintenance expense calculations
- Eligible Services List, Miscellaneous pages 19-20 for FY 2007
- Correspondence with PIA reviewer, dated 11/19/2007, disagreeing with the proposed reduction in funding due to the maintenance expense eligibility



Universal Service Administrative Company

Schools and Libraries Division

**FUNDING COMMITMENT DECISION LETTER**  
(Funding Year 2007: 07/01/2007 - 06/30/2008)

April 15, 2008

ROBERT BECK  
GLYNN COUNTY SCHOOL DISTRICT  
790 NEWTOWN-YARDLEY RD.  
SUITE 410  
NEWTOWN, PA 18940

Re: Form 471 Application Number: 576358  
Billed Entity Number (BEN): 127476  
Billed Entity FCC RN: 0011880978  
Applicant's Form Identifier: 10GlynnGARDB#2

Thank you for your Funding Year 2007 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$383,825.68 is "Approved."
- The amount, \$79,582.20 is "Denied."

Please refer to the Report on the page following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

**NEXT STEPS**

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity) - as products and services are being delivered and billed

**TO APPEAL THIS DECISION:**

If you wish to appeal a decision in this letter, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
  - Appellant name,
  - Applicant name and service provider name, if different from appellant,
  - Applicant BEN and Service Provider Identification Number (SPIN),
  - Form 471 Application Number 576358 as assigned by USAC,
  - "Funding Commitment Decision Letter for Funding Year 2007," AND
  - The exact text of the decision that you are appealing.

FUNDING COMMITMENT REPORT  
Billed Entity Name: GLYNN COUNTY SCHOOL DISTRICT  
BEN: 127476  
Funding Year: 2007

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 576358  
Funding Request Number: 593393  
Funding Status: Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 504960000616309  
SPIN: 143017811  
Service Provider Name: Computer Software Innovations, Inc.  
Contract Number: N/A  
Billing Account Number: N/A  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2007  
Service End Date: N/A  
Contract Award Date: 02/05/2007  
Contract Expiration Date: 09/30/2008  
Site Identifier: 34303  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$52,940.91  
Pre-discount Amount: \$52,940.91  
Discount Percentage Approved by the USAC: 90%  
Funding Commitment Decision: \$47,646.82 - FRN approved as submitted  
Funding Commitment Decision Explanation: MR1: GLYNN CO FACILITIES, GLYNN CO TRANSPORTATION, GLYNN CO ATHLETIC DEPT and GLYNN CO FOOD AND NUTRITION has been removed from Block 4 of the Form 471 application at the request of the applicant. <><><><> MR2: The dollars requested were reduced to remove: {the ineligible product(s)/service(s) Tandberg Border Controller with associated installation, training and support}. <><><><> MR3: The FRN was modified from \$62,386.91 to \$52,940.91 to agree with the applicant documentation. <><><><> MR4: This FRN contained products/services for internal connections and basic maintenance. You did not post on your Form 470 for basic maintenance. The FRN was split in order to conduct an independent review of these respective services. Your new FRN for basic maintenance is 1640431 and service provider is Computer Software Innovations, INC. The product(s)/service(s) remaining in this FRN are internal connections.  
FCDL Date: 04/15/2008  
Wave Number: 046  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2009

Billed Entity Name: GLYNN COUNTY SCHOOL DISTRICT

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Funding Request Number: 1593430.

Funding Status: Not Funded

Category of Service: Internal Connections

Form 470 Application Number: 504960000616309

SPIN: 143017811

Service Provider Name: Computer Software Innovations, Inc.

Contract Number: N/A

Billing Account Number: N/A

Multiple Billing Account Numbers: N

Service Start Date: 07/01/2007

Service End Date: N/A

Contract Award Date: 02/05/2007

Contract Expiration Date: 09/30/2008

Site Identifier: 34313

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$0.00

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$16,295.91

Pre-discount Amount: \$16,295.91

Discount Percentage Approved by the USAC: 80%

Funding Commitment Decision: \$0.00 - Svc/Discnt will NOT be funded

Funding Commitment Decision Explanation: MR1: GLYNN CO FACILITIES, GLYNN CO TRANSPORTATION, GLYNN CO ATHLETIC DEPT and GLYNN CO FOOD AND NUTRITION has been removed from Block 4 of the Form 471 application at the request of the applicant. <><><><><> MR2: The shared discount was reduced to a level that could be validated by third party data. <><><><><> MR3: The ERN was modified from \$119,692.91 to \$16,295.91 to agree with the applicant documentation. MR4: This ERN contained products/services for internal connections and basic maintenance. You did not post on your Form 471 for basic maintenance. The ERN was split in order to conduct an independent review of these respective services. Your new ERN for basic maintenance is 1640234 and service provider is Computer Software Innovations Inc.. The product(s)/service(s) remaining in this ERN are internal connections charges. <><><><><> DR1: Given Program demand, the funding cap will not provide for Internal Connections and/or Basic Maintenance of Internal Connections at your approved discount level to be funded. Please see <http://www.universalservice.org/s1/> for further details.

FCDL Date: 04/15/2008

Wave Number: 046

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2009

FUNDING COMMITMENT REPORT  
Billed Entity Name: GLYNN COUNTY SCHOOL DISTRICT  
BEN: 127476  
Funding Year: 2007

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 576358  
Funding Request Number: 1593479  
Funding Status: Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 504960000616309  
SPIN: 143017811  
Service Provider Name: Computer Software Innovations, Inc.  
Contract Number: N/A  
Billing Account Number: N/A  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2007  
Service End Date: N/A  
Contract Award Date: 02/05/2007  
Contract Expiration Date: 09/30/2008  
Site Identifier: 34297  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$16,295.91  
Pre-discount Amount: \$16,295.91  
Discount Percentage Approved by the USAC: 90%  
Funding Commitment Decision: \$14,666.32 - FRN approved; modified by SLD  
Funding Commitment Decision Explanation: MR1: GLYNN CO FACILITIES, GLYNN CO  
TRANSPORTATION, GLYNN CO ATHLETIC DEPT and GLYNN CO FOOD AND NUTRITION has been  
removed from Block 4 of the Form 471 application at the request of the applicant.  
<><><><> MR2: The dollars requested were reduced to remove: the ineligible  
product(s)/service(s) Basic Maintenance charges that were not posted for on the Form  
470. <><><><> MR3: The FRN was modified from \$19,692.91 to \$16,295.91 to agree  
with the applicant documentation. <><><><> MR4: This FRN contained  
products/services for internal connections and basic maintenance. You did not post  
on your Form 470 for basic maintenance. The FRN was split in order to conduct an  
independent review of these respective services. Your new FRN for basic maintenance  
is 1640435 and service provider is Computer Software Innovations Inc. The  
product(s)/service(s) remaining in this FRN are internal connections charges.  
FCDL Date: 04/15/2008  
Wave Number: 046  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2009

FCC Form

Approval by OMB  
3060-0806

470

Schools and Libraries Universal Service  
Description of Services Requested  
and Certification Form

Estimated Average Burden Hours Per Response: 4.0 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator website and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this application.

(To be completed by entity that will negotiate with providers.)

## Block 1: Applicant Address and Identifications

Form 470 Application Number: 504960000616309

Applicant's Form Identifier: 10GlynnGARDB#2

Application Status: CERTIFIED

Posting Date: 01/05/2007

Allowable Contract Date: 02/02/2007

Certification Received Date: 01/24/2007

## 1. Name of Applicant:

GLYNN COUNTY SCHOOL DISTRICT

## 2. Funding Year:

07/01/2007 - 06/30/2008

## 3. Your Entity Number

127476

## 4a. Applicant's Street Address, P.O.Box, or Route Number

1313 EGMONT ST

City

BRUNSWICK

State

GA

Zip Code

31520-7244

## b. Telephone number

(912) 267- 4100

## c. Fax number

(912) 265- 2011

## 5. Type Of Applicant

☒ Individual School (individual public or non-public school)☒ School District (LEA; public or non-public [e.g., diocesan] local district representing multiple schools)☒ Library (including library system, library outlet/branch or library consortium as defined under LSTA)☒ Consortium (intermediate service agencies, states, state networks, special consortia of schools and/or libraries)

## 6a. Contact Person's Name: Robert Beck

First, if the Contact Person's Street Address is the same as in Item 4 above, check this box. If not, please complete the entries for the Street Address below.

## 6b. Street Address, P.O.Box, or Route Number

790 Newtown Yardley Road

Suite 410

City  
Newtown

State  
PA

Zip Code  
18940

Check the box next to your preferred mode of contact and provide your contact information. One box MUST be checked and an entry provided.

☒ 6c. Telephone Number (267) 352- 0137

☒ 6d. Fax Number (215) 504- 5047

☒ 6e. E-mail Address robertbeck@e-rate-ects.org

## Block 2: Summary Description of Needs or Services Requested

### 7 This Form 470 describes (check all that apply):

a. ☒ Tariffed or month-to-month services to be provided without a written contract. A new Form 470 must be filed for non-contracted tariffed or month-to-month services for each funding year.

b. ☒ Services for which a new written contract is sought for the funding year in Item 2.  
Check if you are seeking ☒ a multi-year contract and/or ☒ a contract featuring voluntary extensions

c. ☒ A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous funding year.

**NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous funding year OR a contract signed on/before 7/10/97 and previously reported on a Form 470 as an existing contract do NOT require filing of a new Form 470.**

**What kinds of service are you seeking: Telecommunications Services, Internet Access, Internal Connections Other than Basic Maintenance, or Basic Maintenance of Internal Connections? Refer to the Eligible Services List at [www.sl.universalservice.org](http://www.sl.universalservice.org) for examples. Check the relevant category or categories (8, 9, 10 and/or 11 below), and answer the questions in each category you select.**

### 8 ☒ Telecommunications Services

**Do you have a Request for Proposal (RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for at least 28 days. If you check YES and your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.**

a. ☒ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Web at at or via (check one):

☒ the Contact Person in Item 6 or ☒ the contact listed in Item 12.

b. ☒ NO, I have not released and do not intend to release an RFP for these services.

**Whether you check YES or NO, you must list below the Telecommunications Services you seek. Specify each service or function (e.g., local voice service) and quantity and/or capacity (e.g., 20 existing lines plus 10 new ones). See the Eligible Services List at [www.sl.universalservice.org](http://www.sl.universalservice.org) for examples of eligible Telecommunications services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Attach additional lines if needed.**

c. ☒ Check this box if you prefer discounts on your bill. ☒ Check this box if you prefer reimbursement after paying your bill in full. ☒ Check this box if you do not have a preference.

### 9 ☒ Internet Access

**Do you have a Request for Proposal (RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for at least 28 days. If you check YES and your RFP is not available to all interested bidders, or if you check NO and you have or intend to have**



**and RFP, you risk denial of your funding requests.**

a ☒ **YES**, I have released or intend to release an RFP for these services. It is available or will become available on the Web at or via (check one):  
☒ the Contact Person in Item 6 or ☐ the contact listed in Item 12.

b ☐ **NO**, I have not released and do not intend to release an RFP for these services.

**Whether you check YES or NO, you must list below the Internet Access Services you seek. Specify each service or function (e.g., monthly Internet service) and quantity and/or capacity (e.g., for 500 users). See the Eligible Services List at [www.sl.universalservice.org](http://www.sl.universalservice.org) for examples of eligible Telecommunications services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Attach additional lines if needed.**

c ☒ Check this box if you prefer discounts on your bill. ☒ Check this box if you prefer reimbursement after paying your bill in full. ☐ Check this box if you do not have a preference.

Service or Function:	Quantity and/or Capacity:
Web hosting service	For district and school web sites
Blackberry-type service	For up to 50 cellular service lines

#### 10 ☒ **Internal Connections Other than Basic Maintenance**

**Do you have a Request for Proposal (RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for at least 28 days. If you check YES and your RFP is not available to all interested bidders, or if you check NO and you have or intend to have and RFP, you risk denial of your funding requests.**

a ☒ **YES**, I have released or intend to release an RFP for these services. It is available or will become available on the Web at or via (check one):  
☒ the Contact Person in Item 6 or ☐ the contact listed in Item 12.

b ☐ **NO**, I have not released and do not intend to release an RFP for these services.

**Whether you check YES or NO, you must list below the Internal Connections Services you seek. Specify each service or function (e.g., a router, hub and cabling) and quantity and/or capacity (e.g., connecting 1 classroom of 30 students). See the Eligible Services List at [www.sl.universalservice.org](http://www.sl.universalservice.org) for examples of eligible Telecommunications services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Attach additional lines if needed.**

c ☒ Check this box if you prefer discounts on your bill. ☒ Check this box if you prefer reimbursement after paying your bill in full. ☐ Check this box if you do not have a preference.

Service or Function:	Quantity and/or Capacity:
Video components	For 3 sites - (3) CODEC's, (1) master control unit, plus associated hardware, design, installation and maintenance
Video data distribution components	For 18 sites - upgrade or add eligible data distribution components (hubs, switches, routers, etc.) for interactive video conferencing capability, with associated hardware, installation, configuration & maintenance
Exchange e-mail servers	Two - (1) for email and (1) for backup storage, with associated hardware, software, installation, configuration & maintenance
Voice mail components & file server backup	For district phone system, with associated hardware, installation, configuration & maintenance